#### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	Chapter 7
ALEXANDER E. JONES,	Case No. 22-33553 (CML)
Debtor.	

TRUSTEE'S <u>AMENDED</u> WITNESS AND EXHIBIT LIST FOR MONDAY, DECEMBER 9, 2024, HYBRID HEARING ON TRUSTEE'S <u>EXPEDITED</u> MOTION FOR ENTRY OF AN ORDER IN FURTHERANCE OF <u>THE SALE OF ASSETS OF FREE SPEECH SYSTEMS, LLC</u> [Relates to Dkt. Nos. 859, 915]

Christopher R. Murray in his capacity as Chapter 7 Trustee (the "**Trustee**") for the bankruptcy estate of Alexander E. Jones ("**Alex Jones**") files this **Amended** Witness and Exhibit List for the hybrid hearing to be held on Monday, December 9, 2024, at 1:00 p.m. (prevailing Central Time) before the Honorable Christopher Lopez at the United States Bankruptcy Court for the Southern District of Texas, Courtroom 401, 515 Rusk Street, Houston, Texas 77002.

#### **EXHIBITS**

No.	Description	M A R	O F F	O B J	A D M	D A T	Disposition After Trial
1.	Free Speech Systems LLC Chapter 11 Bankruptcy Schedules [Case No. 22-60043, Dkt. No. 900]						
2.	Order Dismissing Free Speech Systems LLC Chapter 11 Bankruptcy Case [Case No. 22-60043, Dkt. No. 956]						
3.	Order Converting Debtor's Chapter 11 Case to a Case Under Chapter 7 of the Bankruptcy Code [Dkt. No. 708]						
4.	Alexander E. Jones Chapter 7 Bankruptcy Schedules [Dkt. No. 749]						
5.	Jones Conversion SOFA [Dkt. No. 750]						

No.	Description	M A R	O F F	O B J	A D M	D A T	Disposition After Trial
6.	Trustee's Application to Employ Tranzon and Tranzon360 as Sale Broker, inclusive of all exhibits thereto [Dkt. No. 828]						
7.	Order Authorizing Trustee's Employment and Retention of Tranzon and Tranzon360 as Sale Broker [Dkt. No. 844]						
8.	Order Granting Trustee's Motion for Entry of an Order Authorizing the Winddown of Free Speech Systems, LLC [Dkt. No. 859]						
9.	Notice of Auction for the Sale of Assets of Free Speech Systems, LLC Free and Clear of Any and All Claims, Interests, and Encumbrances [Dkt. No. 862]						
10.	Trustee's Emergency Motion for Entry of an Order Authorizing (i) the Sale of Intellectual Property Assets in Connection with the Winddown of Free Speech Systems, LLC and (ii) the Assumption and Assignment of Executory Contracts, inclusive of all exhibits thereto [Dkt. No. 882]						
11.	Notice of Successful Bidder and Backup Bidder in the Auction for the Assets of Free Speech Systems, LLC Free and Clear of Any and All Claims, Interests, and Incumbrances [Dkt. No. 903]						
12.	Trustee's Expedited Motion for Entry of an Order in Furtherance of the Sale of Assets of Free Speech Systems, LLC, exclusive of all exhibits thereto, [Dkt. No. 915]						
13.	Asset Purchase Agreement [Dkt. No. 915-1]						
14.	November 4, 2024, Free Speech Systems Sealed Bid Offering Memorandum						
15.	First United American Companies, LLC Initial Bid [Dkt. No. 915-3]						
16.	Global Tetrahedron and the Connecticut Families Initial Bid [Dkt. No. 915-4]						
17.	Global Tetrahedron and the Connecticut Families Initial Bid Letter [Dkt. No. 915-5]						
18.	First United American Companies, LLC Final Bid [Dkt. No. 915-6]						

No.	Description	M A R	O F F	O B J	A D M	D A T	Disposition After Trial
19.	Global Tetrahedron and the Connecticut Families Final Bid [Dkt. No. 915-7]						
20.	Order Supplementing Order Dismissing Case [Case No. 22-60043, Dkt. 1021]						
21.	October 11, 2024, Free Speech Systems Sealed Bid Offering Memorandum						
22.	October 31, 2024, Free Speech Systems Sale Activity Report						
23.	November 8, 2024, Analysis of Sealed Bids						
24.	Gift Class Recovery Analysis						
25.	November 11, 2024, Email from Jeff Tanenbaum regarding Qualified Bidder						
26.	November 11, 2024, Email from Jeff Tanenbaum regarding Notice regarding FSS Overbid Process, including all attachments thereto						
27.	November 12, 2024, Email from Jeff Tanenbaum regarding Notice regarding FSS Overbid Process, including all attachments thereto						
28.	Analysis of Free Speech System's Final Bids						
29.	Connecticut Appellate Court Opinion						
30.	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 7 case or related adversary proceeding						
31.	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party						
32.	Any exhibit listed by any other party						

## **WITNESSES**

- 1. Christopher R. Murray, Trustee for the Alex Jones bankruptcy estate.
- 2. Jeff Tanebaum, President of ThreeSixty Asset Advisors
- 3. Any witness and rebuttal witnesses listed by any other party.

The Trustee reserves the right to amend and/or supplement this Witness and Exhibit List as necessary in advance of the Hearing. The Trustee also reserves the right to use any exhibits

presented by any other party and to ask the Court to take judicial notice of any document. Finally, the Trustee reserves the right to introduce any previously admitted exhibit.

Dated: December 8, 2024.

# Respectfully submitted, **PORTER HEDGES LLP**

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COUNSEL TO CHRISTOPHER R. MURRAY, CHAPTER 7 TRUSTEE

## **CERTIFICATE OF SERVICE**

I certify that on December 8, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System in the United States Bankruptcy Court for the Southern District of Texas.

/s/ Joshua W. Wolfshohl
Joshua W. Wolfshohl